

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: INSURANCE BROKERAGE ANTITRUST LITIGATION APPLIES TO ALL ACTIONS	: : : : :	MDL No. 1663 Civil Action No. 04-5184 (CCC-JAD)
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DISCOVERY DISPUTE ORDER

The Court having heard and considering discussion on the issue of the presentation of discovery disputes to the Court, and for good cause shown:

IT IS on the _____ day of August, 2013, hereby:

ORDERED that all discovery disputes in this matter shall be presented as follows:

1. A party that wishes to raise a discovery dispute or disputes shall first meet and confer with its adversary or adversaries. The "meet and confer" requirement is not satisfied by solely an exchange of written communications and requires that the parties having the dispute speak via telephone or in-person;
2. If a dispute remains after the meet and confer process is concluded the party that raised the dispute or disputes shall file a letter with the Court not to exceed five pages setting out the dispute or disputes;
3. The adverse party or parties may file an opposing letter not to exceed five pages within five calendar days;
4. The party that raised the dispute or disputes may file a reply letter not to exceed five pages within three calendar days.
5. The letters must detail (a) the request/issue in dispute; (b) the response; (c) efforts to resolve the dispute; (d) why the complaining party believes the information is

relevant and why the responding party's response continues to be deficient; and (e) why the responding party believes the response is sufficient.

AND IT IS FURTHER ORDERED that any party that seeks relief from the time limits or page limits set forth in this Order shall seek consent from its adversary and then apply to the Court for such relief by letter;

AND IT IS FURTHER ORDERED that no other aspect of any previous orders are altered by this Order save for prior orders that provided instructions on the presentation of discovery disputes to the Court through joint letters.

JOSEPH A. DICKSON, U.S.M.J.